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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

APR 21 2010

JAMES R. LARSEN, CLERK  
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SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SUZIE ZUNIGA,  
TOMMY L. HONEYCUTT, JR., and  
PEDRO ALVARADO, JR.

Defendants.

**CR-10-6040-RMP**

INDICTMENT

Vio: 18 U.S.C. § 1343  
Wire Fraud  
(Counts 1-5)

18 U.S.C. §§ 1343 and 2  
Wire Fraud  
(Counts 6-15)

The Grand Jury Charges:

**INTRODUCTION:**

At all times material to the Indictment:

1. Defendant SUZIE ZUNIGA was employed by government contractor Fluor Hanford (FH) as a Material Coordinator for the Plutonium Finishing Plant (PFP) at the U.S. Department of Energy (DOE) Hanford Site, in Benton County, Washington.

2. FH issued credit cards (known as purchase cards or "p-cards") to SUZIE ZUNIGA to facilitate the purchase of supplies needed for the PFP.

3. FH purchase cards were issued by JP Morgan Chase Bank which established a credit purchase procedure with FH whereby the bank would draw down by draft or electronic funds transfer (EFT) from a line of credit that the U.S.

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1 Treasury had established with U.S. Bank for DOE expenses. JP Morgan Chase  
2 used wire communications to draw from the DOE's U.S. Bank line of credit once a  
3 month to reimburse the purchase card expenses FH accumulated each month.

4 4. The JP Morgan Chase monthly draw down of funds from US Bank  
5 occurred through, and as a result of, wire communications outside the State of  
6 Washington.

7 5. Defendant TOMMY L. HONEYCUTT, JR., was employed as a  
8 pipefitter at the U.S. DOE Hanford site in Benton County, Washington.

9 6. Defendant PEDRO ALVARADO, JR., was employed as a driver at  
10 the U.S. DOE Hanford site in Benton County, Washington.

11 7. Between October 1, 2004, and July 1, 2008, Fast Pipe and Supply  
12 Co., Inc. ("Fast Pipe") was designated by FH as an authorized vendor of supplies  
13 to the PFP and did provide supplies to the PFP during this time period.

14 8. Between October 1, 2004, and July 1, 2008, Kennewick Industrial  
15 and Electric ("KIE") was designated by FH as an authorized vendor of supplies to  
16 the PFP and did provide supplies to the PFP during this time period.

17 9. Between October 1, 2004, and July 1, 2008, Harold's Repair and  
18 Rental ("Harold's") was designated by FH as an authorized vendor of supplies to  
19 the PFP and did provide supplies to the PFP during this time period.

20 10. In the normal course of business a material coordinator for the PFP  
21 would receive requests for supplies from employees of the PFP. The requests for  
22 supplies by employees would often be transmitted by Electronic Bills of Materials  
23 (EBOMS) to the material coordinator. If the requested supply item was approved  
24 for purchase, the material coordinator would note the order in the P Card Web  
25 Solution System. Once the supply item was purchased by the material coordinator  
26 with a JP Morgan Chase Bank Credit Card, a sales order would be prepared by the  
27 vendor and provided to the material coordinator. On a monthly basis, material  
28

1 coordinators would sign and submit a Transaction Approval Report confirming  
2 that their JP Morgan Chase Bank credit card account statements were consistent  
3 with the purchases the material coordinator had made that month.

4 11. From on or about October 1, 2004, and continuing to on or about July  
5 1, 2008, defendant SUZIE ZUNIGA caused FH to make approximately 219  
6 purchase card transactions with vendors under the guise of PFP supply purchases  
7 from Fast Pipe, KIE, Harold's and other vendors totaling approximately  
8 \$557,696.46.

9 12. The 219 purchase card transactions described in paragraph 11 caused  
10 writings, signs, signals, and sounds to be transmitted by wire transmission outside  
11 the State of Washington.

#### 12 **THE SCHEME TO DEFRAUD**

13 13. Beginning on a date unknown to the Grand Jury, but not later than on  
14 or about October 1, 2004, and continuing until on or about July 1, 2008, in the  
15 Eastern District of Washington and elsewhere, SUZIE ZUNIGA, TOMMY L.  
16 HONEYCUTT, JR., and PEDRO ALVARADO, JR., and other persons unknown  
17 to the Grand Jury, devised and intended to devise a scheme and artifice to defraud  
18 and to obtain money and property by means of false and fraudulent pretenses and  
19 representations involving purported purchases of supplies for the DOE's PFP  
20 through the fraudulent use of the purchase card of SUZIE ZUNIGA issued to her  
21 as an employee of FH.

22 14. It was further a part of the scheme and artifice to defraud that SUZIE  
23 ZUNIGA, TOMMY L. HONEYCUTT, JR., and PEDRO ALVARADO, JR., used  
24 the p-card provided to SUZIE ZUNIGA as an employee of FH to obtain property  
25 with a value of approximately \$557,696.46 by means of false and fraudulent  
26 pretenses and representations using SUZIE ZUNIGA'S employer's line of credit  
27 with the DOE and then keeping the property for personal use and for other  
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1 personal pecuniary gain.

2 15. It was further a part of the scheme and artifice to defraud that SUZIE  
3 ZUNIGA, TOMMY L. HONEYCUTT, JR., and PEDRO ALVARADO, JR.  
4 attempted to conceal and disguise their scheme to obtain money and property by  
5 creating fraudulent invoices to make it appear as if the PFP actually received  
6 supplies from Fast Pipe, KIE, Harold's and other vendors, when, in fact, no such  
7 supplies were delivered to the PFP.

8 16. It was a further part of the scheme and artifice to defraud that the  
9 Defendants, SUZIE ZUNIGA, TOMMY L. HONEYCUTT, JR., and PEDRO  
10 ALVARADO, JR., communicated in person to devise a scheme in which the  
11 interstate wires were used to defraud the United States in order to obtain property  
12 and money (approximately \$557,696.46) from its agency, the DOE, through means  
13 of materially false and fraudulent representations, omissions, pretenses and  
14 promises concerning SUZIE ZUNIGA's purported purchases for FH.

15 17. It was a further part of the scheme and artifice to defraud that SUZIE  
16 ZUNIGA, TOMMY L. HONEYCUTT, JR., and PEDRO ALVARADO, JR.,  
17 obtained money and property by making materially false and fraudulent  
18 representations concerning SUZIE ZUNIGA's purported purchases of supplies for  
19 the PFP, knowing that the funds would not be used in a manner consistent with the  
20 representations and promises made, but instead for personal indebtedness and for  
21 personal gain.

22 18. It was a further part of the scheme and artifice to defraud that during  
23 the period beginning on or about October 1, 2004, and continuing up through on  
24 or about July 1, 2008, using her government funded p-card, SUZIE ZUNIGA  
25 caused approximately 219 fraudulent transactions to be made with Fast Pipe, KIE,  
26 Harold's, and other vendors totaling approximately \$557,696.46.

27 19. It was a further part of the scheme and artifice to defraud that during  
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1 the period beginning on or about October 1, 2004, and continuing up through on  
2 or about July 1, 2008, SUZIE ZUNIGA listed approximately 219 fraudulent Fast  
3 Pipe, KIE, Harold's, and other vendors purchase order descriptions in FH's P-Card  
4 Web Solution purchase card electronic system.

5 20. It was a further part of the scheme and artifice to defraud that during  
6 the period beginning on or about October 1, 2004, and continuing up through on  
7 or about July 1, 2008, SUZIE ZUNIGA created approximately 219 fraudulent  
8 EBOM orders.

9 21. It was a further part of the scheme and artifice to defraud that during  
10 the period beginning on or about October 1, 2004, and continuing up through on  
11 or about July 1, 2008, SUZIE ZUNIGA signed and submitted approximately 45  
12 monthly false Transaction Approval Reports to her supervisors at FH.

13 22. It was a further part of the scheme and artifice to defraud that during  
14 the period beginning on or about October 1, 2004, and continuing up through on  
15 or about July 1, 2008, SUZIE ZUNIGA fraudulently altered approximately 219  
16 vendor sales orders from Fast Pipe, KIE, Harold's and other vendors to make it  
17 appear that legitimate items were being purchased.

18 23. It was a further part of the scheme and artifice to defraud that during  
19 the period beginning on or about October 1, 2004, and continuing up through on  
20 or about July 1, 2008, SUZIE ZUNIGA, TOMMY L. HONEYCUTT, JR., and  
21 PEDRO ALVARADO, JR., took possession of property fraudulently purchased  
22 from Fast Pipe, KIE, Harold's, and other vendors at the vendor store locations or  
23 at other off-site locations not located on the DOE Hanford site located in Benton  
24 County, Washington.

25 24. It was a further part of the scheme and artifice to defraud that during  
26 the period beginning on or about October 1, 2004, and continuing up through on  
27 or about July 1, 2008, SUZIE ZUNIGA, used wire transmissions, to wit: telephone  
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calls, e-mails, and facsimile transmissions to place p-card orders with vendors for property which she intended for her personal use or pecuniary gain, or the personal use or pecuniary gain of TOMMY L. HONEYCUTT, JR., and PEDRO ALVARADO, JR., and other persons.

COUNTS 1-5

18 U.S.C § 1343

Wire Fraud

25. Paragraphs 1 through 24 are incorporated into Counts 1 through 5 by this reference.

26. On or about each of the dates referenced below, within the Eastern District of Washington, the Defendant, SUZIE ZUNIGA, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent representations, omissions, pretenses and promises, did transmit and cause to be transmitted, certain writings, signs, signals, and sounds in interstate commerce, as specified, by means of a wire communication as follows:

Count	Date	P-Card Log Number	Wire Communication
1	5/22/08	H006567411353	\$1,612.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
2	3/12/07	H00656742791	\$9,300.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.

3	4/13/07	H00656742902	\$3,163.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
4	6/20/07	H006567410125	\$4,575.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
5	11/16/07	H006567410734	\$3,325.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.

All in violation of 18 U.S.C. § 1343.

COUNTS 6-10

18 U.S.C §§ 1343 and 2

Wire Fraud

27. Paragraphs 1 through 24 are incorporated into Counts 6 through 10 by this reference.

28. On or about each of the dates referenced below, within the Eastern District of Washington, the Defendants, SUZIE ZUNIGA and TOMMY L. HONEYCUTT, JR., for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent representations, omissions, pretenses and promises, did transmit and cause to be transmitted, certain writings, signs, signals, and sounds in interstate commerce, as specified, by means of a wire communication, and did aid and abet the scheme and transmissions as follows:

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Count	Date	P-Card Log Number	Wire Communication
6	1/25/05	H00656748995	\$192.84 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-6257.
7	9/9/05	H00656741060	\$1,525.90 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
8	4/19/06	H00656741881	\$579.98 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
9	10/25/06	H00656742403	\$950.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
10	1/18/08	H006567410477	\$2,376.99 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.

All in violation of 18 U.S.C. §§ 1343 and 2.



COUNTS 11-15

18 U.S.C §§ 1343 and 2

## Wire Fraud

29. Paragraphs 1 through 24 are incorporated into Counts 11 through 15 by this reference.

30. On or about each of the dates referenced below, within the Eastern District of Washington, the Defendants, SUZIE ZUNIGA and PEDRO ALVARADO, JR., for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent representations, omissions, pretenses and promises, did transmit and cause to be transmitted, certain writings, signs, signals, and sounds in interstate commerce, as specified, by means of a wire communication, and did aid and abet the scheme and transmissions as follows:

Count	Date	P-Card Log Number	Wire Communication
11	4/19/06	H00656741881	\$579.98 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
12	4/20/07	H00656742937	\$4,380.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
13	8/10/07	H006567410310	\$3,198.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
14	8/10/07	H006567410311	\$3,133.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.

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15	11/16/07	H006567410734	\$3,325.00 credit card transaction from Suzie Zuniga's FH issued government funded JP Morgan Chase credit card account # XXXX-XXXX-XXXX-9557.
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All in violation of 18 U.S.C. §§ 1343 and 2.

DATED this 20 day of April, 2010.

A TRUE BILL

Foreperson

  
James A. McDevitt  
United States Attorney

  
Ronald W. Skibbie  
Assistant United States Attorney

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